

National Park Service Hazardous Waste Management & Pollution Prevention Team Washington DC 20240 (202)565-1240(x3)

SPILL PREVENTION PLANNING

DEFINITIONS

SPCC Plans: SPCC stands for Spill Prevention Control and Countermeasures. SPCC plans provide recommendations and requirements to prevent environmental damage resulting from spills of oil.

Oil: For the purpose of SPCC plans, oil means "oil of any kind or any form, including but not limited to petroleum, fuel oil, sludge, oil refuse, petroleum-derived products, and oil mixed with wastes other than dredge spoil" (40 CFR 112.2). Interpretations of this definition include non-petroleum oils such as vegetable and animal oils as well as petroleum-derived products such as gasoline.

APPLICABLE STANDARDS

Federal: SPCC plans are required by the Environmental Protection Agency (EPA) as stated in 40 CFR, Part 112.

State: State SPCC regulations may be more stringent than federal. The requirements for your state must be reviewed to thoroughly assess your park's compliance.

Other: Additional Federal and state standards may apply to the storage of oil at your park.

THRESHOLDS & APPLICABILITY

General Applicability

Parks are subject to SPCC regulations if they meet the following criteria:

- The capacity of any aboveground storage tank (AST) exceeds 660 gallons of oil; or
- The total aboveground storage capacity for the Park exceeds 1,320 gallons of oil;
 or
- The underground storage capacity for the Park exceeds 42,000 gallons of oil; and
- If, due to its location, the Park could reasonably be expected to discharge oil into or upon the navigable waters of the United States or adjoining shorelines. This final condition, though vague, applies to most parks.

Note: Residential aboveground heating oil tanks and transformer oil container capacities should be included in calculations for assessing applicability.

Substantial Harm Determination

The park must complete a "Certification of Substantial Harm Determination Form," and include it with their SPCC Plan. This form will help the park assess whether they are required to prepare and submit a Park Response Plan based on the relative risk their park presents to navigable waters and adjoining shorelines. Most parks will not be required to prepare a Facility Response Plan.

SPCC PLAN REQUIREMENTS

SPCC plans must include the following elements:

- Explanation of regulatory applicability, penalties, and appropriate certifications;
- II. Description of oil storage and handling areas;
- III. Description of surface and interior drainage patterns;
- IV. Description of past spill events;
- V. Analysis of potential spill scenarios;
- VI. Evaluation of the potential impact of spills on the environment;
- VII. Description of spill response and notification procedures;
- VIII. Description of emergency response equipment;
- IX. Description of emergency prevention procedures and logs documenting proper training and inspections;
- X. Designation of responsibilities; and
- XI. Description of site security measures.
- XII. Professional Engineer's review and signature.

SPILL RESPONSE

Parks must establish an oil spill response program that includes:

- Identification of spill response functions,
- Training appropriate response personnel,
- Having necessary response equipment available on site, and
- Ensuring that the proper regulatory notifications are performed in the event of a spill.

SPILL NOTIFICATIONS

All spills must be documented in the park's SPCC plan. Spills that result in discharges to

the environment in a harmful quantity, as determined by the qualified individual identified in your SPCC plan, must be reported to the National Response Center (800/424-8802) as well as regional EPA and state offices. Local emergency planning commissions will also require notification if there is one established in your area.

Additional regulatory notifications are required for discharges that exceed 1,000 gallons or when two reportable spill events occur in any twelve month period.

RECORDKEEPING

The SPCC plan is not required to be filed with the EPA, except under special circumstances involving significant releases to the environment. However, a copy of the plan must be available for onsite review by the



EPA Regional Administrator if requested.

Parks are responsible for maintaining the following SPCC records concerning oil releases and prevention efforts:

- 1) Completed inspection checklists and logs;
- 2) Meeting minutes;
- 3) Training logs;
- 4) Documentation of spill reports;
- 5) Correspondence between regulatory agencies and the Park;
- 6) Records of changes made to the SPCC plan; and
- Documentation of spill response and remediation efforts.

ENVIROFACTS X-REFERENCES

- Hazardous Waste Generator Status Determination
- Used Oil Management
 - Maintenance Wastewater Management

SPCC Regulatory Applicability Checklist

	Checklist Item	Gallons
l.	What is the largest capacity for a single AST storing oil at your Park? Proceed to question II regardless of response.	
		(If this value is greater than 660 gallons, your Park probably requires an SPCC Plan.)
II.	Use the following inventory to determine the total amount of aboveground oil storage at your Park (<i>This includes gasoline, diesel, and any other materials meeting the definition of "oil."</i>):	
	(a) What is the maximum amount of oil stored in all heating oil ASTs present at your Park? This includes residential and non-residential	(a)
	tanks. (b) What is the maximum storage capacity of oil stored in non-heating oil ASTs present at your Park?	(b)
	(c) What is the maximum storage <u>capacity</u> of oil stored in miscellaneous 1 to 55 gallon containers present at your Park? (Only include materials that meet the SPCC definition of oil)	(6)
	(d) What is the maximum amount of oil that could be stored in all pad and pole-mounted electrical transformer present at your Park? (Parks should include transformers that are owned by local utilities in their inventories as they are still responsible for ensuring that any release from these units is controlled and cleaned up. Generally, the Park will not respond to transformer releases but will be responsible for immediately notifying the utility company.)	(d)
	(e) What is the maximum amount of oil stored in other aboveground storage units not covered by items (a) through (d)?	(e)
	(f) Total the amounts listed for items (a) through (e) and enter here.	(f)
		(If this value is greater than 1,320 gallons, your Park probably requires an SPCC plan.)
III.	What is the maximum storage capacity of oil stored in underground storage tanks at your Park?	
		(If this value is greater than 42,000 gallons, your Park probably requires an SPCC Plan.)